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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

13 MICHAEL TERPIN,  
14 Plaintiff,  
15 v.  
16 AT&T MOBILITY LLC; and DOES  
17 1-25,  
18 Defendants.

19 CASE NO. 2:18-CV-06975-ODW-KS  
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21 [Assigned to the Hon. Otis D. Wright II]

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**DECLARATION OF ASHLEY E.  
JOHNSON IN SUPPORT OF JOINT  
DISCOVERY STIPULATION**

Joint Stipulation Filed Concurrently  
Herewith]

Hearing Date: September 21, 2022  
Time: 10:00 a.m.  
Discovery Cutoff: January 30, 2023  
Pretrial Conference: April 10, 2023  
Trial: May 2, 2023  
Judge: Hon. Karen L. Stevenson

## DECLARATION OF ASHLEY E. JOHNSON

I, Ashley E. Johnson, declare as follows

1. I am an attorney duly licensed and admitted to practice before all courts in the State of Texas and am an attorney in the law firm of Gibson Dunn & Crutcher LLP, attorneys of record for Defendant AT&T Mobility LLC. I am also admitted *pro hac vice* in the above-captioned case. The facts set forth herein are of my own personal knowledge. If called as a witness, I could and would testify to these facts under oath.

2. I make this declaration in support of Defendant's portion of the Joint Discovery Stipulation filed concurrently herewith pursuant to the Local Rule 37-2 of the Court.

3. Attached hereto as Exhibit 1 is an email exchange between Timothy Toohey, counsel for Michael Terpin, and me on May 9-10, 2022.

4. Attached hereto as Exhibit 2 is a privilege log provided by Mr. Terpin, which was attached to Exhibit 1.

5. Attached hereto as Exhibit 3 is an email exchange dated March 27, 2018, between Mr. Toohey and in-house litigation counsel for AT&T Mobility LLC, Niki Okcu.

6. Attached hereto as Exhibit 4 is an email exchange dated August 15, 2018, between Mr. Toohey and in-house litigation counsel for AT&T Mobility LLC, Niki Okcu.

7. Attached hereto as Exhibit 5 is an email exchange dated August 21, 2018, between Mr. Toohey and in-house litigation counsel for AT&T Mobility LLC, Niki Okcu. I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 24 day of August 2022 at Dallas, Texas.

## GIBSON, DUNN & CRUTCHER LLP

By: ashley johnson

Ashley E. Johnson

Attorneys for Defendant AT&T MOBILITY  
LLC